

Remarks

Claims 1, 9, 16, and 29 were previously amended. Claims 6, 14, 21, 23-28, and 34 were previously canceled. Claims 1-5, 7-13, 15-20, 22 and 29-33 are pending in this application. The Examiner has rejected claims 1-3, 5, 7-8, 29-31 and 33 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,606,630 to Gunlock (hereinafter “Gunlock”) in view of U.S. Patent No. 6,839,747 to Blumenau, et al. (hereinafter “Blumenau ‘747”). The Examiner has rejected claims 16-20 and 22 under 35 U.S.C. § 103(a) as being unpatentable over Gunlock, in view Blumenau ‘747, further in view of U.S. Patent No. 6,931,440 to Blumenau (hereinafter “Blumenau ‘440”), and further in view of U.S. Patent No. 6,665,714 to Blumenau, et al. (hereinafter “Blumenau ‘714”). The Examiner has rejected claims 4, 9-13, 15 and 32 under 35 U.S.C. § 103(a) as being unpatentable over Gunlock, in view of Blumenau ‘747, in further view of Blumenau ‘440 and in further view of Blumenau ‘714. Applicants respectfully traverse the Examiner’s rejections.

A. Remarks Regarding Rejection of Claims 1, 9, 16, and 29 Under 35 U.S.C. § 103(a)

To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). “All words in a claim must be considered in judging the patentability of that claim against the prior art.” In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). If an independent claim is nonobvious under 35 U.S.C. § 103, then any claim depending therefrom is nonobvious. In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).

The combination of Gunlock and Blumenau fails to teach or suggest all the claim limitations of independent claim 1. Specifically, the combination fails to teach or suggest that

“the unique hardware address table stores the unique hardware address of every target device that each respective host is authorized to access” as required by claim 1. Examiner even states that this limitation is not found in the above combination. (Office Action at 4.) Blumenau discusses that all of the ports of a Fibre Channel cloud 100 are accessible by every device. (Blumenau at 16:3-15.) The present invention requires that a respective host will have authorized access to certain target devices based upon entries specific to that host in a centralized unique hardware address table. Such a requirement is one of the advantages of the present invention. (See Specification at 7:20-23.) According to the present invention, a host will “not” attempt a port login if it does not have authorization -- the unique hardware address of the target device must be present on the unique hardware address table as a target device that the respective host is authorized to access. In Blumenau, the device simply obtains the port’s ID and identifier from the name server to login to the device. (Blumenau at 16:11-15.)

Further, Gunlock in view of Blumenau in view of Blumenau ‘747 fails to teach or suggest “that the host bus adapter for each respective host will not attempt to perform a port login with a target device unless the unique hardware address of that target device is present on the unique hardware address table as a target device that the respective host is authorized to access,” as required by independent claim 1. Examiner cites to Blumenau ‘747 as teaching this limitation. (Office Action at 4, ¶ 9.) However, Blumenau ‘747 teaches that “identifiers are distributed to coupled HBAs.” (Blumenau ‘747 at 16:2-7.) These identifiers are “distributed among the variety of HBAs that are coupled to the storage system.” (Id.) Blumenau ‘747 also discusses that a unique identifier is assigned for each I/O request from the HBA to the storage system. (See Blumenau ‘747 at 14:36-42.) In contrast, the present invention requires “a unique hardware address of every target device” and not simply that the I/O requests have unique identifiers.

Also, Blumenau and Blumenau '747 do not disclose that "each respective host will not attempt to perform a port login with a target device unless ..." as required by independent claim 1. Blumenau '747 does not disclose a login procedure. Blumenau discusses a port login where "a device obtains the port's ID from the Name Server and uses the ID to perform a 'port login' to establish a logical connection tot he port." (Blumenau at 16:11-14.) Blumenau '747 discusses an encryption authentication based on access keys generated utilizing random numbers. (Blumenau '747 at 14:65-15:12.) Neither of the cited references disclose the logging in, or rather the not logging in, based upon the criteria of this limitation, in particular based upon a "unique hardware address of the target device" being "present on the unique hardware address table"

As Gunlock in combination with Blumenau and further in view of Blumenau '747 fails to teach or suggest each and every element of independent claim 1, Gunlock in combination with Blumenau and further in view of Blumenau '747 does not anticipate these claims. As independent claims 9, 16, and 29 have similar limitations as independent claim 1, for the reasons stated above with respect to independent claim 1, Gunlock in combination with Blumenau and further in view of Blumenau '747 fails to teach or suggest each and every element of independent claims 9, 16, and 29. Applicants respectfully submit that these independent claims are allowable. Additionally, Applicants submit that dependent claims 2-5, 7-8, 10-13, 15, 17-20, 22, and 30-33 are allowable, as they depend from otherwise allowable base claims.

B. Remarks Regarding Rejection of Dependent Claims 2-5, 7-8, 10-13, 15, 17-20, 22, 30-33 Under 35 U.S.C. § 103

The rejection of dependent claims 2-5, 7-8, 10-13, 15, 17-20, 22, 30-33 will not be discussed individually herein, as each of these claims depends, either directly or indirectly, from an otherwise allowable base claim.

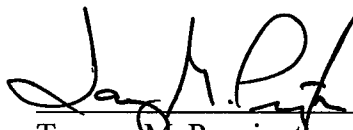
C. No Waiver

All of Applicants' arguments and amendments are without prejudice or disclaimer. Additionally, Applicants have merely discussed example distinctions from the cited references. Other distinctions may exist, and Applicants reserve the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. By not responding to additional statements made by examiner, Applicants do not acquiesce to examiner's additional statements, such as, for example, any statements relating to what would be obvious to a person of ordinary skill in the art. The example distinctions discussed by Applicants are sufficient to overcome the anticipation rejections.

Conclusion

Applicants respectfully submit that the pending claims 1-5, 7-13, 15-20, 22 and 29-33 of the present invention are allowable. Applicants respectfully request that the rejection of the pending claims be withdrawn and that these claims be passed to issuance.

Respectfully submitted,



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